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SCHAGER DAIRY FARM

Mike & Patricia Schager
4924 County Road KK
Orland, California 95963
(530) 865-3616
FAX (530) 865-4802
schagercows@thegrid.net

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California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, California 95670

Re: Administrative Draft NPDES General Permit for Milk Cow Dairies

We own and operate a 400 cow dairy in Orland, California. Our dairy has been in operation at this location for the past twenty-six years. We began back in 1978 with 35 cows and 80 acres; and have slowly expanded from a pasture program, to a drylot, to our current freestall facility and 150 acres. We have always tried to be good stewards of the land and conscientious caretakers of our cows. We have built up our facilities conservatively trying to stay within our means and not overextend ourselves.

We are very proud of our operation and in 2002 we were certified in the Environmental Stewardship module of the California Dairy Quality Assurance Program. This was accomplished with a lot of planning and hard work. We consider this to be a worthy accomplishment that should not be taken lightly. We feel that this accomplishment should weigh in on the requirements of the NPDES permitting process. The paperwork, measurements and testing requirements (even though they may not have been carried out by "certified" personnel) should be sufficient for the permitting requirements for smaller dairies (under 700 cows); especially since all these were reviewed by a 3rd party unbiased evaluator.

We find the administrative draft to be especially onerous for smaller dairy operations. Many of the requirements for monitoring and reporting would be especially costly and place quite a hardship on smaller operations. This blanket permit was focused on much larger operations and also on areas of the state where there are denser populations of concentrated agricultural operations. It is unfair to place all these same requirements on operations that may not be able to bear the costs of such requirements. Another aspect to be considered is that most of the "registered professionals" required to provide the certifications required by these permits will be focused on working with dairy operations of considerable size to merit a more sizable stipend. We even now find it difficult to obtain "professional" consultants once they learn how large (or small) our operation is

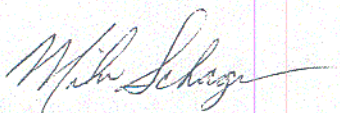
and where it is located. Many don't wish to travel north of Sacramento. They tend to be concentrated in the larger Tulare area. This permitting process is contributing to an escalation of unethical "professionals" wishing to provide us with services that are not necessary nor serve any purpose, except to line their pockets. The laboratory fees associated with the required monitoring is particularly burdensome. The costs to perform these tests and at the frequency required is unreasonable and unrealistic. What purpose would they serve? We have no way to recoup these costs.

We do not appreciate that elements of our day-to-day operation would be under public scrutiny. All reports should be kept on site for review by personnel from the RWQCB and not for public review. The information you are asking for in the Notice of Intent is in an unmanageable format and serves no real purpose (additional facility information). Most of the information requested could be found in the CDQAP paperwork.

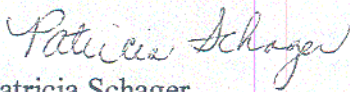
The dairy people of this state contribute a great deal to its economy and we feel that we are being singled out for extreme scrutiny that is not warranted. No other agricultural operations are receiving such regulatory harassment. We wish to be able to produce the quality milk we always have, at a reasonable profit; and to do it while protecting our land and assets.

We face many issues each day on our operation. There are equipment failures and repairs, cow comfort and disease problems, employee concerns, crop monitoring as well as the pressures of urban sprawl and public scrutiny of how we do business. As a small dairyperson, we find ourselves wearing many hats and trying to accomplish many tasks each day. We are unable to delegate many of these tasks because of our size and must rely on our own resources to survive. We feel that undue regulation will only serve to make it unlikely for us to continue in this business we love.

Sincerely,



Mike Schager



Patricia Schager